

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

WILLIAM P. BUTCHER AS SPECIAL REPRESENTATIVE )  
OF THE ESTATE OF TONI BAUM AND THE ESTATE OF )  
OTTO J. BAUM; GRETCHEN MCALINDEN; UNKNOWN )  
HEIRS AND LEGATEES OF TONI BAUM; UNKNOWN )  
HEIRS AND LEGATEES OF OTTO J. BAUM; VILLAGE )  
OF GLENDALE HEIGHTS; MICHAEL BAUM; KARIE )  
DENNIGER MOBLEY, TIMOTHY DENNIGER, JOHN )  
DENNIGER; UNKNOWN OWNERS AND NON-RECORD )  
CLAIMANTS; )

) Case No. 12-cv-8193

) Judge: Gary Feinerman

**MOTION FOR ENTRY OF JUDGMENT OF FORECLOSURE**

NOW COMES, Plaintiff, UNITED STATES OF AMERICA, by and through its attorneys, Potestivo & Associates, P.C., and moves this Honorable Court, for the Entry of a Judgment of Foreclosure.

In support, attached please find Plaintiff's Affidavit of Prove-Up. (See Exhibit "1", Affidavit).

Respectfully submitted,

GARY S. SHAPIRO  
United States Attorney

By: s/Caleb J. Halberg  
CALEB J. HALBERG  
Attorney for the United States  
223 W. Jackson Blvd., Suite 610  
Chicago, IL 60606  
(312) 263-0003  
chalberg@potestivolaw.com

**CERTIFICATE OF SERVICE**

I, Caleb J. Halberg, certify that a true and correct copy of the foregoing **Motion for Entry of Judgment of Foreclosure** was served upon counsel of record through operation of the Court's Case Management/Electronic Case Files system on May 21, 2013, and on the following non-ECF filers by first class mailing:

**See attached Service List**

*s/Caleb J. Halberg*  
CALEB J. HALBERG  
Attorney for the United States  
223 W. Jackson Blvd., Suite 610  
Chicago, IL 60606  
(312) 263-0003  
chalberg@potestivolaw.com

## Service List

William P. Butcher as Special Representative  
of the Estates of Toni Baum and Otto J. Baum  
2044 Ridge Road  
Homewood, IL 60430

Unknown Heirs and Legatees of Toni Baum  
96 Glen Hill Drive  
Glendale Heights 60139

Unknown Heirs and Legatees of Otto J. Baum  
96 Glen Hill Drive  
Glendale Heights 60139

Gretchen McAlinden  
270 Main Street  
Glen Ellyn, Illinois 60137

Village of Glendale Heights, Office of the Village Clerk  
300 Civic Center Plaza  
Glendale Heights, Illinois 60139

Michael Baum  
390 Valley View Circle  
Dahinda, IL 61428

Karrie Denniger Mobley  
2115 J Street # 2  
Iowa City, IA 52240

Timothy Denniger  
2115 J Street # 2  
Iowa City, IA 52240

John Denniger  
2409 Miami  
Iowa City, IA 52240

Unknown Owners and Non-Record Claimants  
96 Glen Hill Drive  
Glendale Heights 60137

s/Caleb J. Halberg  
CALEB J. HALBERG  
Attorney for Plaintiff  
223 W Jackson Blvd., Suite 610  
Chicago, Illinois 60606  
(312) 263-0003  
chalberg@potestivolaw.com